

THE HONORABLE JUDGE LAUREN KING

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ELECTION INTEGRITY
COALITION UNITED, a Washington State
Nonprofit Corporation; DOUG BASLER;
HOWARD FERGUSON; DIANA BASS;
TIMOFEY SAMOYLENKO; AMY BEHOPE;
MARY HALLOWELL; SAMANTHA BUCARI;
RONALD STEWART; LYDIA ZIBIN;
CATHERINE DODSON,

Plaintiffs,

v.

JULIE WISE, Director of King County Elections;
KING COUNTY, and DOES 1-30, inclusive,

Defendants,

and

WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE,

Proposed Intervenor
Defendant.

No. 2:21-cv-01394-LK

PROPOSED INTERVENOR
DEFENDANT WASHINGTON
STATE DEMOCRATIC CENTRAL
COMMITTEE'S SECOND NOTICE
OF SUPPLEMENTAL AUTHORITY

Proposed Intervenor Washington State Democratic Central Committee ("WSDCC")
submits this Second Notice of Supplemental Authority to aid this Court in adjudicating WSDCC's
Motion to Intervene and, if allowed intervention, its proposed Motion to Dismiss. *See* ECF Nos.
14, 14-1.

1 Plaintiff Washington Election Integrity Coalition United (“WEiCU”) filed a petition in the
 2 Washington Supreme Court alleging that Governor Jay Inslee violated the Constitution by
 3 “pressure[ing]” employees of the Department of Licensing to register non-citizens to vote and
 4 disciplining employees who pushed back. *See* Attach. A. WEiCU asked the court to issue a
 5 mandate to “verify the United States citizenship for each voter registered” in Washington and for
 6 the removal of any non-citizens from the voter databases. *See id.* at 10. The Court promptly
 7 dismissed the case and awarded attorneys’ fees to the state as a sanction, in the amount of
 8 \$28,384.70. *See* Attach. B, C. Washington’s Solicitor General subsequently filed a bar complaint
 9 against WEiCU’s counsel, Virginia Shogren, stating that there is “no meaningful dispute that Ms.
 10 Shogren’s legal arguments were frivolous” and that she had “specific knowledge that the legal
 11 arguments about certain essential elements were frivolous.” *See* Attach. D at 2. He added that
 12 “unfounded and baseless allegations, like those made by Ms. Shogren have the predictable effect
 13 of undermining the public’s faith in our democratic institutions.” *See id.*

14
 15 Dated: June 30, 2022

s/ Reina A. Almon-Griffin

Reina A. Almon-Griffin, WSBA No. 54651

RAlmon-Griffin@perkinscoie.com

Kevin J. Hamilton, WSBA No. 15648

KHamilton@perkinscoie.com

Amanda J. Beane, WSBA No. 33070

ABeane@perkinscoie.com

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, Washington 98101-3099

Telephone 206.359.8000

Facsimile 206.359.9000

*Attorneys for Proposed Intervenor
 Washington State Democratic Central
 Committee*

CERTIFICATE OF SERVICE

On June 30, 2022, I caused to be served upon the below named counsel of record, at the address stated below, via the method of service indicated, a true and correct copy of the foregoing document.

Ann Marie Summers	<input type="checkbox"/>	Via hand delivery
King County Prosecuting Attorney's	<input type="checkbox"/>	Via U.S. Mail, 1st Class,
Office (2ND AVE)		Postage Prepaid
1191 2ND AVE	<input type="checkbox"/>	Via Overnight Delivery
STE 1700	<input type="checkbox"/>	Via Facsimile
SEATTLE, WA 98101	<input checked="" type="checkbox"/>	Via Eservice
Phone: 206-477-1120		
Email: ann.summers@kingcounty.gov		

Mari Isaacson
 King County Prosecuting Attorney's
 Office (2ND AVE)
 1191 2ND AVE
 STE 1700
 SEATTLE, WA 98101
 Phone: 206-477-1120
 Email: mari.isaacson@kingcounty.gov

David JW Hackett
 King County Prosecuting Attorney's
 Office (2ND AVE)
 1191 2ND AVE
 STE 1700
 SEATTLE, WA 98101
 Phone: 206-477-1892
 Fax: 206-296-8819
 Email: david.hackett@kingcounty.gov

Virginia Pearson Shogren
 VIRGINIA P SHOGREN PC
 961 W OAK COURT
 SEQUIM, WA 98382
 360-461-5551

Email: vshogren@gmail.com

Doug Basler
1851 Central Place S, Ste. 123
Kent, WA 98032
206-601-3133

- ☐ Via hand delivery
- ☒ Via U.S. Mail, 1st Class,
Postage Prepaid
- ☐ Via Overnight Delivery
- ☐ Via Facsimile
- ☐ Via Eservice

Howard Ferguson
4357 13th Ave. S.
Seattle, WA 98108
206-898-2696

Diana Bass
P. O. Box 7364
Bellevue, WA 98008
425-649-9765

Timofey Samoylenko
1921 R St NE
Auburn, WA 98002
206-305-3692

Mary Hallowell
17505 462nd Ave SE
North Bend, WA 98045
425-888-2208

Samantha Bucari
3546 S 244th St
Kent, WA 98032
253-653-7553

Ronald Stewart
29506 51st Ave S
Auburn, WA 98001
206-790-8187

Lydia Zibin
254 145th PL SE
Bellevue, WA 98007
425-894-1467

Catherine Dodson
42131-212th Ave SE
Enumclaw, WA 98022
253-709-3339

**I certify under penalty of perjury under the laws of the
State of Washington that the foregoing is true and correct.**

EXECUTED at Seattle, Washington, on June 30, 2022.

s/ Reina A. Almon-Griffin

Reina A. Almon-Griffin, WSBA No. 54651